

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
JAMEO DEWAYNE POLLOCK)	Case No. 17-35895-KRH
)	Chapter 13
Debtor)	

**MOTION TO EXPEDITE HEARING ON MOTION
TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on his Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on November 28, 2017.
2. The Debtor has applied for and Basic Auto Sales RVA has approved a loan to the Debtor in the amount of \$27,140.89 plus interest at 16.75% per annum to be repaid with 72 equal monthly payments of \$600.00 for the purchase of a 2018 Dodge Durango SXT or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle because Debtor's current vehicle has broken down, and Debtor needs a replacement vehicle to travel to and from work.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.
5. The Debtor's Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on their Motion to Incur Debt, Shorten the Notice Period required for said Motion, and for such other and further relief as is just and proper.

Dated: September 21, 2021

JAMEO DEWAYNE POLLOCK

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
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(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane
Counsel for Debtor

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NOTICE OF MOTION AND HEARING

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to Debtor's Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **September 22, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

- **REMOTE HEARING INFORMATION:**

Due to the COVID-19 public health emergency, no in-person hearings are being held.

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the “Zoom Request Form”), which is available on the Court's internet website at www.vaeb.courts.gov, on the page titled, “Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information.” Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

***The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge’s attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

***** PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: September 21, 2021

JAMEO DEWAYNE POLLOCK

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
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/s/ James E. Kane
Counsel for Debtor

Afni
Attn: Bankruptcy
Po Box 3097
Bloomington, IL 61702

Capital One
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Capital One Auto Finance
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Dept Of Ed/Navient
Attn: Claims Dept
P.O. Box 9635
Wilkes Barr, PA 18773

Dept Of Ed/Navient
Po Box 9635
Wilkes Barre, PA 18773

Focused Recovery Solutions
9701-Metropolitan Ct
Ste B
Richmond, VA 23236

Fst Premier
601 S Minneapolis Ave
Sioux Falls, SD 57104

Gerald Taylor
8500 Perrymont Road
Richmond, VA 23237

JL Walston & Associates
Attn: Bankruptcy
2609 N Duke St, Ste 501
Durham, NC 27704

Navient
Attn: Bankruptcy
Po Box 9500
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Navient
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Receivables Performance Mgmt
Attn: Bankruptcy
Po Box 1548
Lynnwood, WA 98036

Title Max
4722 S. Laburnum Ave
Henrico, VA 23231